

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:)	
)	No. 14 C 7581
FIRST FARMERS FINANCIAL)	
LITIGATION.)	Judge St. Eve

**UNITED STATES' MOTION TO EXTEND THE CLAIMS BAR
DATE FOR CLAIMS BY THE SMALL BUSINESS ADMINISTRATION**

The United States of America, on behalf of the U.S. Small Business Administration, by Zachary T. Fardon, United States Attorney for the Northern District of Illinois, timely moves to extend the claims bar date for claims asserted by the Small Business Administration ("SBA") to March 31, 2016. In support thereof, it states as follows:

1. On September 8, 2015, the court set a bar date of January 29, 2016 for the Department of Agriculture ("USDA") and SBA to assert claims against the assets of the Receivership Estate.

2. The court further ordered the USDA and SBA to inform the court by January 15, 2016 if they needed to extend the bar date.

3. The SBA has been diligently investigating whether it has additional loans involved in the fraud perpetrated by First Farmers Financial, LLC ("FFF") that would require asserting claims against the Receivership Estate.

4. As part of the investigation, the SBA identified an SBA guaranteed loan for a hotel property located in Davenport, FL. Issues related to the Captain's Cay/Davenport Ventures hotel property are currently before this court.

5. The SBA has identified additional SBA loans obtained by family and friends of Nikesh and Trisha Patel. The SBA does not anticipate that all of these loans are connected to the fraud perpetrated by FFF. However, to date, SBA has not been able to investigate all of these loans.

6. The SBA is in the process of reviewing these additional loan files and anticipates that its review of these files should be completed by mid-March.

7. The SBA anticipates that it will be able to determine whether it has any additional claims to assert against the Receivership Estate, and file any identified claims by March 31, 2016.

8. In the event SBA completes its investigation prior to mid-March, it will notify the court and interested parties and endeavor to file any necessary claim prior to March 31, 2016.

WHEREFORE, the United States requests that the court extend the bar date for the SBA to assert claims against the Receivership Estate to March 31, 2016.

Respectfully submitted,

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